

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

SHERRELL GRANT,  
Plaintiff,

v.

**Civil Action No. 3:20-cv-00394**

TARGET CORP.,  
Defendant.

**PLAINTIFF'S NOTICE OF EXPERT WITNESS TESTIMONY IN REBUTTAL**

**COMES NOW** the Plaintiff, Sherrell Grant, by counsel, and hereby designates her expert witnesses in accordance with the Federal Rules of Civil Procedure and the Local Rules of this Court, and states that the following persons may be called to provide expert testimony in rebuttal at the trial on December 6, 2021, either live or by video testimony:

**A. James B. Wade, PhD  
Virginia Commonwealth University  
Division of Clinical Psychology  
P. O. Box 980308  
Richmond, Virginia 23298  
Telephone: 804 828-1470**

Plaintiff expects to call Dr. James Wade to testify as an expert in the fields of neuropsychology and neuropsychological testing. Dr. Wade is a licensed clinical neuropsychologist. He is affiliated with Virginia Commonwealth University where he holds the titles, among others, of Director, Psychological Assessment Center and Professor of Psychology, Neurology and Anesthesiology. His signed report is marked as **Exhibit A**, attached to this designation and incorporated herein by reference. Dr. Wade's qualifications and list of publications are set forth in his curriculum vitae, marked as **Exhibit B** and attached hereto. His

fee schedule and a list of cases in which he has testified are marked as **Exhibits C and D**, respectively and attached hereto.

Dr. Wade will generally explain the field of neuropsychology and how it relates to the injuries sustained by the Plaintiff. Dr. Wade will educate the jury regarding the principles of neuropsychology and will explain neuropsychological testing and how such tests are read and interpreted and explain how they inform treating physicians regarding the health of the Plaintiff. Dr. Wade will testify and comment upon the Plaintiff's care, treatment and symptoms subsequent to the January 14, 2018 accident as it relates to his testing and conclusions in this case. Dr. Wade will comment on relevant anatomy and physiology. He may refer to and explain relevant medical literature designated and may use medical illustrations, models, films, animations or other visual aids to illustrate his testimony.

Dr. Wade will base his opinions on his review of medical records and diagnostic testing results of the case, any relevant medical authorities and literature, his training, knowledge, education, clinical experience and examination of the Plaintiff. All opinions will be to a reasonable degree of medical probability. Dr. Wade will rebut any testimony that is inconsistent with his own and reserves the right to amend his opinions as the case progresses and new information is supplied. Dr. Wade may also respond to the opinions of other experts or fact witnesses relating to any subject matter within his area of expertise and experience. Any deposition testimony given by Dr. Wade in connection with this case is hereby incorporated as if set forth fully and is made part of this designation.

**B. Anna Hristova, M.D.**  
**Institute for Future Sciences and Medicine**  
**10049 Midlothian Turnpike, Suite G**  
**North Chesterfield, Virginia 23235**  
**Telephone: (804) 349-8900**

Dr. Hristova is a board certified neurologist. Dr. Hristova has been offered by the Plaintiff in the Plaintiff's Notice of Expert Witness Testimony to testify to the extent of the Plaintiff's injuries which she suffered as a result of the January 14, 2018 accident, regarding the subsequent care necessitated by her injuries and regarding the damages suffered. Her education, training, experience and other qualification are set forth in her curriculum vitae, a copy of which vitae was filed with the Notice and provided to the Defendant. Dr. Hristova was provided with the medical records and imaging of Sherrell Grant as listed in her signed report attached to the Notice. All of the medical records reviewed are already in the possession of the Defendant but can be made available upon request.

Dr. Hristova has reviewed the designation of expert witnesses filed by the Defendant. Dr. Hristova will respond to the opinions that are attributed to Robert DeLorenzo, M.D., Sarah Chagnon, M.D., and Michael Simpson, M.D. in the designation filed by the Defendant, Target Corp. To the extent that any of the experts designated by the Defendant share those opinions of Dr. DeLorenzo, Dr. Chagnon and Dr. Simpson, this designation should be taken as the designation of Dr. Hristova's rebuttal of those opinions as well. Her response is contained in her signed report, marked as **Exhibit E**, attached hereto and incorporated herein by reference.

Dr. Hristova will base her opinions on her education, training, experience and treatment of the Plaintiff. When she testifies at deposition and/or at trial, Dr. Hristova may use different terminology and emphasis, and may amplify and expand her opinions. Dr. Hristova may refer to and explain relevant medical literature designated and may use medical illustrations, models, films, animations or other visual aids to illustrate her testimony. Opinions stated by Dr. Hristova in her deposition, if taken, are incorporated herein by reference.

Respectfully,  
SHERRELL GRANT,

/s/Michael R. Krol  
By Counsel

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 10<sup>th</sup> day of September, 2021, I will or have electronically filed the foregoing with the Clerk of Court using the PACER system, which will then send a notification of such filing (NEF), and by Dropbox to the following:

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/s/Michael R. Krol